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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ANU ALLEN,

Plaintiff,

-against-

CHANEL INC.,

Defendants.
-----X

Civil Action No.: 12-cv-6758(RPP)

DECLARATION OF CHRISTOPHER
THOMPSON, IN OPPOSITION TO
MOTION TO SUMMARY JUDGMENT
AND JUDGMENT ON THE COUNTER-
CLAIM FOR UNJUST ENRICHMENT

I, CHRISTOPHER THOMPSON, declare as follows under penalty of perjury:

1. I am a member of the Bar of the State of New York, and am admitted to practice before this Court. I am counsel to plaintiff, ANU ALLEN.
2. I submit this Declaration to place before the Court certain pleadings and documents on which plaintiff relies in opposition to defendant's motion to amend their counterclaims and for sanctions.
3. Exhibit A is a true and correct copy of Plaintiffs production ~~B~~ Bates stamped ("000001" to "000139").
4. Exhibit B is a true and correct copy of Chanel Bates Stamped documents "000687-000693".
5. Exhibit C is a true and correct copy of Chanel Bates Stamped documents "000676-000681".
6. Exhibit D is a true and correct copy of Chanel Bates Stamped documents "000253-000254".


7. Exhibit E is a true and correct copy of Chanel Bates Stamped documents "000255-000256".
8. Exhibit F is a true and correct copy of Chanel Bates Stamped document "000672".
9. Exhibit G is a true and correct copy of Chanel Bates Stamped documents "000417-000420".
10. Exhibit H is a true and correct copy of Chanel Bates Stamped documents "000522-000528".
11. Exhibit I is a true and correct copy of Chanel Bates Stamped document "000354".
12. Exhibit J is a true and correct copy of Chanel's Answer to Complaint, Affirmative and Other Defenses, and Counterclaims.
13. Exhibit K is a true and correct copy of Anu Allen's deposition transcript.
14. Exhibit L is a true and correct copy of Meaghan Glickman's deposition transcript.
15. Exhibit M is a true and correct copy of Susanna Klein's deposition transcript.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 15th day of December 2014 in West Islip, New York.

Respectfully Submitted,

By:



Christopher Thompson (CT9436)
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Attorney for Plaintiff